

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

EDWARD S. ADAMS,

Defendant.

17-cr-64-DWF-KMM

**STATEMENT OF FACTS
IN SUPPORT OF
EXCLUSION OF TIME
UNDER SPEEDY TRIAL
ACT**

Pursuant to 18 U.S.C. § 3161(h)(7)(A), I, Edward S. Adams, the defendant in this case, agree to the following statement of facts in support of my motion to exclude time under the Speedy Trial Act:

- I retained new counsel following my arraignment, and secured the services of my current counsel to appear in this matter near the end of April 2017, after certain of the Court's previously scheduled disclosure and motion deadlines had already passed.
- This case is complex. The United States seeks to prosecute conduct dating back more than 10 years, involving corporate transactions that were legitimately and necessarily sophisticated, non-routine, and complicated. It will take significant time for my counsel and me to prepare a thorough defense related to these transactions.
- This case involves significant numbers of documents. The United States has secured by warrant or subpoena a voluminous amount of email and documents from different custodians, and I anticipate a large number of emails, corporate

documents, and other related documents will need to be reviewed and mastered to allow my counsel and me to prepare our defense.

- Given the complexities of the corporate transactions referenced above, we expect to need the assistance of expert witnesses to help with our defense (and expect the United States will similarly rely on expert witnesses, whose opinions we will need time and expertise to assess and prepare a defense to).
- We expect to bring motions to dismiss the claims in the Indictment. As in any complex securities action, we expect this briefing to be lengthy and substantive, and anticipate the Court may need more time than in a typical criminal matter to hear and review arguments and issue a ruling.

Based on the above facts, I request that the period of time from March 31, 2017 (the date of my arraignment) until May 7, 2018 (the date my counsel and I have proposed as our trial date in this matter) be excluded from the time in which I would otherwise have to be brought to trial on my case.

I have discussed this matter with my attorney. I voluntarily make this request, with full knowledge of my rights under the Speedy Trial Act.

Dated: May 15, 2017

s/Edward S. Adams

Edward S. Adams, Defendant

Dated: May 15, 2017

s/James L. Volling

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